

SUPERFUND SITE PRELIMINARY CLOSE OUT REPORT

Parker Landfill Superfund Site Lyndonville, Vermont

September 2005

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I. INTRODUCTION

This Preliminary Close-Out Report documents that EPA has completed construction activities at the Parker Landfill Superfund Site in accordance with OSWER Directive 9320.2-09A-P, January 2000. EPA conducted a final inspection of the cap on June 20, 2001 ard final inspection of the groundwater remedy on September 26, 2005 and has determined that the full remedy has been constructed in accordance with all Remedial Design and Remedial Action (RD/RA) plans and specifications. No additional construction activities are anticipated.

II. SUMMARY OF SITE CONDITIONS

A. Site Location and history

The Parker Landfill Superfund Site (the Site), is located on Lily Pond Road in the southeast portion of the Town of Lyndon, Caledonia County, Vermont (Figure 1). The Landfill occupies approximately 25 acres of a 75 acre parcel on the southern side of Lily Pond Road, approximately 0.2 miles southeast of Lily Pond. The Landfill contains a Solid Waste Disposal Area (SWDA) and three smaller inclustrial waste areas (IWS) which have been consolidated and capped as a result of an April 1995 Record of Decision (ROD).

The surrounding area consists of mobile home communities and single family homes, as well as a combination of pasture land, agricultural land and woodlands. A private school and a nursing home are located .5 miles south of the Site. An unnamed stream traverses the Site and flows southwest to the Passumpsic River, which is located approximately 0.5 mile from the Site. The Passumpsic River has been classified as Class B which should be managed to maintain a level of quality compatible with good aesthetic value; high quality habitat for aquatic biota, fish, and wildlife; public water supply with filt ation and disinfection; irrigation and other agricultural uses; swimming; and recreation.

The current Landfill was approved as a disposal facility for solid waste in 1971. Ray O. Parker & Sons, Inc. began operating the facility in 1972. Prior to 1972, the disposal area was used as a sand pit and a town disposal area.

The SWDA was used for the disposal of municipal solid waste and, at various times, industrial wastes. Operation of the SWDA continued until July 1992. The three industrial waste areas were used solely for the disposal of industrial wastes. These areas were used at various times between the years of 1972 and 1983.

Industrial wastes disposed at the Site included trichoroethene (TCE), sodium hydroxide, 1,1,1-trichloroethane (1,1,1-TCA), acetone, lacquer and stain sludge, paint sludge, tetrachloroethene (PCE), barium chloride, chromium and nickel plating rinse waters, polyester resin, mercury, electroplating sludge and water soluble coolants. Approximately 1,330,300 gallons of liquid industrial wastes and 688,900 kilograms of liquid, semi-solid, and solid industrial wastes were disposed of at the Site between 1972 and 1983.

In 1979, monitoring wells were installed by the Landfill operator. Routine monitoring of the Landfill by the Vermont Department of Environmental Conservation (VDEC) revealed the presence of chlorinated volatile organic compounds (VOCs) in the groundwater and in the unnamed stream adjacent to the Landfill. Follow-up sampling detected VOCs above Federal Maximum Contaminant Levels (MCLs) in five private wells south of the Landfill. VDEC subsequently installed additional monitoring wells and piezometers in 1984.

In 1985, VDEC informed four parties of their responsibility for performing investigative work and remedial actions at the Site. The parties initially declined and the Vermont Attorney General's office prepared to file a lawsuit against them. One of these parties (Vermont American Corporation) agreed to proceed with investigative and remedial actions and their contractor began a remecial investigation of one of the industrial waste areas in 1987. They installed wellhead treatment systems on five residential wells where contaminant levels exceeded MCLs, which operated until the residences were connected to the Lyndonville water supply.

VDEC completed a Preliminary Assessment/Site Evaluation in 1985, and EPA proposed the Site for listing on the National Priorities List on June 21, 1988; at which point investigative work ceased. On February 16, 1990, the Parker Landfill Site was added to the National Priorities List.

B. <u>Enforcement History</u>

EPA identified 14 Potentially Responsible Parties (PRPs) at the Site. In 1990 EPA entered into an Adminis rative Order by consent with a subset of the PRPs for the Remedial Investigation/Feasibility Study (RI/FS). The RI was released on May 2, 1994. The FS was released on June 1, 1994. EPA issued the ROD in April of 1995. The response action specified in the ROD included the following: a cap over the SWDA and three IWS areas, and a groundwater extraction and treatment system to contain contamination at the source and allow for the natural restoration of the downgradient aquifers.

In 1996, EPA and one party, Ethan Allen, Corp entered into an Administrative Order on Consent to perform the design for the landfill cap portion of the Remedial Action. In 1999, EPA, VDEC and Thirteen PRPs entered into a Consent Decree to construct and maintain the landfill cap portion of the Remedial Action. The remaining PRP, Vermont American Corporation (now owned by Robert Bosch Company), agreed to address the groundwater contamination through a Unilateral Administrative Order (UAO).

No activities were conducted using removal authority at the Site.

C. Waste Characterization

The following sections describe the nature and extent of contaminants that were detected in the areas investigated during the Remedial Investigation.

Soil

Elevated concentrations of VOCs, semi-VOCs and inorganic contaminants at the landfill were detected in surface and subsurface soils collected from the IWS areas. The highest contaminant concentrations were detected in IWS-2 area soils. Contaminants in IWS area soils included 1,2-dichloroethylene (1,2-DCE), TCE, and polycyclic aromatic hydrocarbons (PAHs). The SWDA was estimated to contain approximately 2 million cubic yards of waste and is approx mately 55 feet deep, on average. The RI/FS assessment results indicated that the IWS areas, due to their history of accepting industrial wastes, were serving as additional, discrete source areas from which the VOCs were leaching into site soils and groundwater.

Groundwater and Residential Wells

Groundwater samples from overburden and bedrock monitoring wells at and around the landfill contained a variety of VOCs, SVOCs and inorganic contaminants. Monitoring wells beneath source areas contained some contaminants at concentrations exceeding Federal or State safe drinking water standards, including 1,1,1-TCA, 1,1-dichloroethylene (1,1-DCE), 1,2-DCE, benzene, methylene chloride, TCE, PCE, toluene, vinyl chloride, bis(2-ethylhexyl) phthlate, antimony, arsenic, beryllium, lead, cadmium, manganese, and nickel. Sampling detected VOCs above MCLs in five private wells south of the landfill, which have all been connected to town water. The RI/FS assessment indicated that the contaminants of concern were detected at the highest concentrations at the source area, and were decreasing in concentration with distance from the landfill as a result of diffusion and natural degradation processes

Surface Water, Sediments, and air

Some metals and low levels of 1,2-DCE and TCE were detected in surface water samples from the unhamed stream that runs along the eastern side of the landfill. Sediment samples from the stream also contained metals. VOCs and SVOCs were detected infrequently and at low concentrations. The highest contaminant concentrations found in sediments were detected in the areas adjacent to the SWDA in the northeast portion of the Site. No VOCs or SVOCs were detected at elevated levels in sediment samples collected from the Passumpsic River. During two rounds of air quality monitoring conducted during the RI, only slightly elevated levels of VOCs were detected at the landfill.

Site Risks and Cleanup Objectives

A human health and environmenta risk assessment for the Site was completed in May 1993. It was determined that there was an unacceptable risk to future residents who may consume contaminated groundwater. Adverse health effects would be due primarily to the presence of TCE, vinyl chloride and arsenic. Residents in these future new homes might also experience adverse health effects if they were exposed to contaminants in IWS area soils and the unnamed stream sediments immediately adjacent to the SWDA on a daily basis for several years. No adverse health effects were expected as a result of contact with the waters from the Passumpsic River or unnamed stream, or as a result of breathing air at the landfill.

The ecological risk assessment indicated the local habitat had been significantly affected due to soil erasion and silt deposit from the SWDA and the IWS areas. Additionally, animals could be affected by the metal contamination detected in surface soils in the IWS area through ingestion of plants and insects.

Based on the calculated risks, EPA identified the following objectives for the Site cleanup:

- * To prevent direct exposures to soil and solid waste in the SWDA and IWS areas;
- * To minimize the movement of contamination in the SWDA and IWS areas into groundwater, surface water and sediment;
- * To prevent ingestion of groundwater which may pose a risk to human health; and

* To comply with Federal and State Applicable or Relevant and Appropriate Requirements (ARARs).

To address the potential risks, site-specific cleanup levels were established for groundwater at the Site. The point of compliance for attaining the cleanup goals is identified as the vertical surface located at the hydraulically downgradient limit of the landfill, that extends in the overburden groundwater to bedrock. A complete description and list of the cleanup goals can be found in Section X.A of the April 1995 ROD.

D. Record of Decision and Explanation of Significant Differences

The April 1995 ROD set forth the selected remedy for the entire Site which involved the construction of a low permeability cap over the consolidated wastes at the landfill, pump and treat of contaminated groundwater to reduce contaminant levels to safe drinking water levels at the landfill perimeter, long-term monitoring of river sediments and ground water, connection of all private residences within the plume buffer zone to the public water supply, and institutional controls to prevent any future ground water consumption and excavation of waste in the landfill area. The selected remedy is a comprehensive approach for this Site that addresses all current and potential future risks caused by Site wastes.

The major components of the remedy included:

- * Construction of multi-layer (IRCRA subtitle C) caps over the SWDA and IWS areas;
- * Installation and operation of a gas collection system to reduce landfill gas accumulation and lateral migration below the solid waste landfill cap;
- * Installation of a source control groundwater treatment system to address overburden and bedrock contamination, the configuration of which was to be determined during pre-design studies of Site groundwater;
- * Conduct long-term sampling and analysis of groundwater and sediment to assess compliance with the groundwater cleanup goals through natural attenuation and to ensure sediments in nearby brooks/river have not been adversely impacted;
- * Institutional controls to protect the cap, and to restrict groundwater use, including the extension of municipal water service to all homes potentially affected by contamination; and
- Review of the Site every five years to evaluate the effectiveness of the remedy

Construction of the landfill cap was initiated in April 1999 and was completed in 2001. One punch list item from the final inspection remains.

Landfill gas monitoring probes to determine the outer limit of landfill gas during low barometric events will be installed in 2005. The existing landfill gas monitoring probe distribution and monitoring has demonstrated, after five years of rigorous data collection, that the landfill gas does not threaten any of the residences adjacent to the landfill. Operation and Maintenance (O&M) is currently being performed by the PRPs. The landfill gas monitoring probes continue to be sampled through the long-term O&M program. In July 2003, an evaluation of the potential for groundwater impacts from the Site to adversely impact indoor air quality was completed, and it was determined that there would be no adverse impacts. This evaluation along with the long-term monitoring data indicates that there are no unacceptable human health risks resulting from landfill gas migration or groundwater vapor intrusion.

In 2004 EPA issued an Explanation of Significant Differences (ESD) for the groundwater component of the remedy. As further described in Section E below, additional hydrogeologic studies were performed at the Site to re-evaluate the selected remedy and consider innovative treatment methods to obtain groundwater cleanup goals. During pre-design sampling of the groundwater it was also determined that there was a significant spread of contamination into the downgradient area that needed to be addressed through engineered controls. In lieu of groundwater pump and treat using activated carbon, it was determined that a dual in-situ groundwater treatment alternative at the source and downgradient areas would more efficiently and cost effectively attain the target cleanup goals for the Site.

At the source area, adjacent to the landfill, pre-design studies indicated that a Permeable Reactive Barrier (PRB) of zero-valent iron would be the most effective method to intercept the highest concentrations of contaminants. It was also determined that a downgradient bio-enhanced natural attenuation system (BNA) consisting of sodium lactate injection and extraction wells would be the most effective treatment in this area of the plume. It was also determined that the combined PRB and BNA remedy would decrease further off-site migration of contaminants that are currently leaching to the ground water and migrating to downgradient areas.

The remedy at the Site currently protects human health and the environment because there is no current use of or exposure to Site media containing contaminant concentrations exceeding ARARs. However, in order for the remedy to be protective in the long-term, the following actions will be taken:

- Finalize the institutional controls and update, as necessary, the zone of institutional controls to prevent human consumption of groundwater;
- * Continue operation and maintenance of the cap and groundwater remedies:
- * Over the next five-year review period, continue the sampling and analysis program as performed during the first five-year review period; and
- * Evaluate the need to update the cleanup goals and need for additional surface water and groundwater monitoring wells.

Construction of the landfill cap, leachate collection system and the groundwater treatment systems at the Site have addressed principal and low-level threat wastes. EPA has determined that human health and the environment are protected and that no further response measures are necessary. The remediation that has been completed as required by the ROD and the ESD has addressed the source of contamination found in the soil, the ground water and in river sediments at the Site. This action has eliminated the principal threat of direct contact to the waste and will reduce infiltration and precipitation of contamination to the ground water, as well as to significantly reduce contaminant levels in the groundwater.

E. Remedial Construction Activities

Landfill Cap Implementation

Construction of the cap began in April 1999 and was completed in December 2001. The design components of the cap were set forth in the Landfill Cap Remedial Design Statement of Work dated November 1996. Industrial wastes and contaminated soils were excavated from one of three separate IWS areas (#2) in June 1999 and placed into the SWDA area prior to capping; eliminating the need for a separate cap over this area. A continuous multi-layer cap was constructed over the SWDA and one of the other IWS areas (#1) between May 1999 and October 2000. A separate multi-layer cap was constructed over the last IWS area (#-3). A landfill gas management system was constructed to control gas generated in the landfill. The active gas management system consists of 17 gas extraction wells, piping and blowers, and an enclosed flare to destroy VOCs and methane.

Institutional controls to restrict groundwater use at the Site and to restrict use of the cap and groundwater treatment areas have been defined and partially implemented; however, there are no current site uses that would violate the proposed institutional controls. A land use easement with the site owner has been drafted and will be finalized in 2006. The landfill has performed well since constructed. Details of the cap are presented in the

Remedial Action Report for the Lar dfill Cap Remedy dated July 2001 and the updated Remedial Action Report dated July 2002 (author, Ethan Allen, Inc.). All punch list items identified in the Final Site inspection for the cap have been completed with the exception of installation of the final 2-3 landfill gas monitoring probes.

The approximate extent of the in-place cap is shown in Figure 2.

Groundwater Remedy Implementation

PRB

The "Draft Source Area Pre-Design Technical Report" dated January 9, 2004, evaluated the feasibility of a zero-valent iron PRB wall to passively intercept the upgradient portion of the VOC-contaminated plume, and to effectively reduce concentrations of chlorinated VOCs in groundwater at the source area. This report concluded, based on column testing and bench-scale studies, that a zero-valent iron PRB would be effective in reducing concentrations of chlorinated VOCs to below the groundwater cleanup goals at the Site.

The PRB was installed using an or en trench technique with excavation by an extended-arm backhoe, using a bio-polymer slurry for support (guar gum). The trench was backfilled with a granular iron/sand blend. The trench is approximately 2.5 feet in width and approximately 235 feet in length. The trench depth is approximately 62 feet below ground surface (bgs), decreasing linearly to approximately 30 feet bgs on the eastern end. The PRB is comprised of four different iron/sand blends. The iron percentage by weight is 34.5 percent, 61.2 percent, 100 percent and 51.3 percent in four different zones.

A total of eight monitoring wells, in three well clusters were installed within the trench during construction. Each cluster was bound together with nylon ties surrounding a section of reinforced steel bar and suspended in the excavation as the trench was backfilled with the iron/sand blend. These wells are 1-inch diameter and constructed using a 10-foot polyvinyl chloride (PVC) screen and riser. In addition, 21 monitoring wells in eight clusters were installed at strategic locations around the PRB perimeter. All wells were tested during construction to assess groundwater quality and geochemistry. The initial testing indicates that VOC concentrations have reduced and that there is an elevated concentration of ethene/ethane. As designed, a reactive zone has been established and dechlorination is occurring. O&M is currently being performed by the PRPs. The location of the constructed PRB is shown in Figure 3.

Following completion of the 2004 FRB Remedial Design Work Plan and during development of the 2004 Remedial Action Work Plan, a wetlands survey and delineation was completed to determine the potential impact of the PRB construction activities on Site wetlands and compliance with the ROD requirements (Executive Order 11990 and Vermont Wetlands Rules). The ROD specified that, depending upon the wetlands classification, either a 1 to 1.5 mitigation effort would be required or a 2 to 1 recreation would be required. During the 2004 investigation it was determined that the wetlands impacted by the PRB construction were in a Vermont Wetlands Class 2 location (isolated shrub Swamp/Emergent Marsh) that has a functional significance of providing surface and groundwater protection. The area of wetlands removed through the PRB construction effort included 0.26 acres (11,206 sq. ft.).

An area located adjacent to a current wetland at the Site (see Figure 5) was selected to create an additional 0.44 acres of Class 2 quality wetlands to meet the ROD requirements. In September 2005 the new wetland area was graded to lower its elevation, erosion control matting was placed, the area was seeded with a wetlands seed mix and was planted with native plant species. Due to recent beaver activity in the area, the final water inlet will be re-evaluated in the Spr ng of 2006 to ensure its effectiveness. Future O&M activities will ensure that the wetland has been established and continues to thrive.

BNA

The "Downgradient Pre-Design Technical Report" dated November 7, 2003, evaluated the feasibility of the use of in-situ bio-remediation technology (i.e., nutrient injection) to enhance natural attenuation/biodegradation of chlorinated aliphatic hydrocarbons in the groundwater downgradient of the landfill. Through field studies it was determined that geochemical cond tions observed in this area are favorable for this technology. The primary nutrient determined for application at the Site, based on the pilot study is sodium lactate (source of organic carbon).

The BNA system constructed at the Site was designed to extract deep overburden groundwater, add nutrients to it and re-inject it. The contaminated groundwater will be extracted using two four-inch diameter extraction wells (with submersible pumps) screened within the top-of-rock zone of the overburden. These extraction wells are constructed of 20 foot long No. 10 continuous slot stainless steel, wire wrapped screens with Schedule 80 PVC risers. An engineered sand pack surrounds the screened interval to maximize yield from the surrounding formation. Each well is completed at the ground surface with a square pre-cast concrete enclosure that is backfilled with 1.5 inch stone. Extracted groundwater is

brought to the ground surface via the submersible pump and a section of 1.5 inch diameter reinforced PVC tubing. This tubing exits the riser and enters an above ground electrical distribution system.

There are fourteen injection wells v/hich create two overlapping capture zones (comprised of well's 1-6 and 7-14 noted in Figure 4). These injection wells are constructed of a 20-foot, No. 10 continuous slot, stainless, wire-wrapped screens ard a Schedule 80 PVC riser. As with the extraction wells an engineered sand pack surrounds each screened interval and completed at the ground surface with a precast concrete enclosure set on a pad of 1.5 inch stone.

The amended groundwater will be njected either under gravity or pressure. Injection wells 1 through 6 are configured for pressure injection and injection wells 7 through 14 are configured for gravity injection. The reagent injection frequency is approximately every six months to maximize the system efficiency and to reduce the potential for bio-fouling at the injection wells. The amendment materials include sodium lactate (60 percent), ammonium carbonate, ar monium phosphate and ammonium bromide. Approximately one month prior to an injection event the groundwater chemistry of the extraction well to be used will be evaluated to determine the appropriate amendment concentrations and delivery rates based on the calculated sulfate and carbon demand. Sampling will be completed based on the August 2005 draft Operation and Maintenance Plan (to be finalized in 2006).

There are both permanent and terr porary BNA system components. The permanent components assembled during construction include the extraction well system, expansion tank and fittings, amendment addition board, pressure injection system and manifold system. System components that are disassembled generally consist of the tubing used to deliver the amended groundwater to the various injection wells. These sections of tubing can be disconnected from the permanent systems identified using quick-connect fittings.

The amendment delivery system is designed to operate continuously during the period of injection. Hours of operation will be recorded daily. The volume of amendment solutions will be periodically assessed and additional amendment volume will be added as necessary. Flow rates into the injection well locations will not exceed 65 gallons per minute. All groundwater generated during system operation (i.e., flow rate monitoring) will be returned to the extraction wells. All post application monitoring procedures are included in the draft August 2005 O&M Plan.

The current estimate for meeting cleanup goals using this dual groundwater treatment system is within thirty years.

Institutional controls have been partially implemented. Institutional controls consist of easements and enforceable local or state regulations to restrict groundwater use. The area of restricted groundwater use was specified in the ROD to extend from the upgradient perimeter of the landfill to all downgradient boundaries of the contaminant plume (both in overburden and bedrock aquifers). The restricted groundwater use area includes a buffer zone around the contaminated area, to prevent potential spreading of the plume caused by drawdown in active private wells outside the area. In 2002, a municipal water line was constructed to service the residences within the proposed institutional control boundary. Groundwater at the Site was reclassified by the VDEC from a Class III (all groundwater) to Class IV (not potable; suitable for some industrial and agricultural use) in November 2003.

F. Redevelopment Potential

EPA reviewed the potential redevelopment options for the Site and has determined that given the current connecting of the property no Redevelopment Plan is necessary. The owner has current plans to subdivide the property for residential use, to connect all future structures to the public water supply system, and to abide by the institutional controls currently being implemented to protect the remedy and to restrict groundwater use.

III. DEMONSTRATION OF QUALITY ASSURANCE AND QUALITY CONTROL

All work performed at the Site was consistent with the ROD, ESD and the final design and RA Work Plans. The RA Work Plan Reports for the source control and management of migration portions of the remedy, including the Quality Assurance Project Plans (QAPP), incorporated all EPA quality assurance and quality control (QA/QC) procedures and protocol. EPA analytical methods were used for all validation and monitoring samples during RA activities. All procedures and protocol followed for soil, discharge water and air sample analysis during the RA will be consolidated and documented in two RA Work Plan Reports scheduled to be complete in 2006. EPA has found the construction quality assurance and performance data to be acceptable. Performance data was regularly reviewed during the construction program to confirm that the materials installed met the requirements of the plans and specifications.

All construction quality assurance material will be provided to EPA and located in the EPA Region I Records Center in Boston, MA. The QA/QC program utilized throughout the RA was sufficiently rigorous and was adequately complied with to enable EPA and VDEC to determine that the results reported are accurate to the degree needed to assure satisfactory execution of the RA, consistent with the ROD, the ESD and accepted Remedial Designs.

IV. ACTIVITIES AND SCHEDULE FOR SITE COMPLETION

All preliminary completion requirements for the Site have been met as specified in OSWER Directive 9320.2-09A-P (January 2000). Specifically, all construction activities that constitute substantial completion identified in the ROD and ESD have been successfully implemented. A final inspection by the EPA and the VDEC for the landfill was conducted on June 20, 2001. The final inspection for the PRB and the BNA systems by EPA and the VDEC was conducted on September 26, 2005 and September 22, respectively. Institutional controls to prevent the use of contaminated groundwater at the Site, and any disturbance of the constructed landfill are currently being pursued with the site owner and surrounding property owners. Operation and Maintenance activities will be permanently maintained by the IPRPs. The approval date of the final Operation and Maintenance Plan is scheduled for June of 2006.

Schedule for Site Completion

TASK	Actual/Estimated	Responsible
IASK	Start/Completion	Organization
Operation/Functional	September 2006	PRPs
period for remedy	Completion_	
Institutional Controls	September 2007	PRPs/EPA/VT DEC
	completior	
Landfill Gas Probes	December 2005	PRPs/EPA
Final Inspection	September 26, 2005	EPA/PRPs/VT DEC
	Completion	
Operation & Maintenance	Ongoing and	PRPs
for the Site	in perpetuit/	
O& M Plan	June 2006	PRPs
Remedial Action Report/	September 2006	PRPs
Approval		
Final Close Out Report	September 2035	EPA
NPL Deletion	September 2036	EPA
Second Five-Year	September 2009	EPA with VT DEC
Review		

V. SUMMARY OF REMEDIATION COSTS

The ROD 30 year present worth cost for the total response action consisted of \$15,450,000 in Capital expenses and \$12,710,000 in O&M expenses, for a total of \$28,200,000. The estimated 30 year present wo th costs associated with the landfill and institutional control component of the remedy was \$11,600,000 in capital expenses and \$2,010,000 in O&M expenses, for a total of \$13,300,000. The post construction estimated costs for these source control compor ent (July 2001) are \$6,411,411 in capital costs and \$100,000 per year (present worth \$1,200,000) in O&M costs.

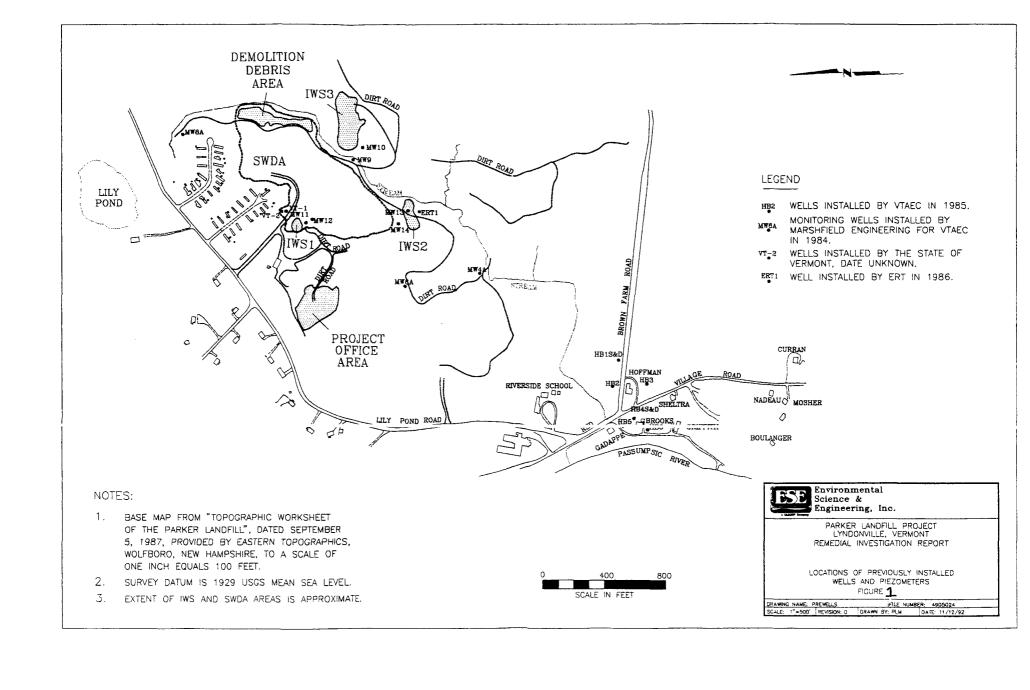
The revised ESD estimate to construct and operate the PRB and BNA groundwater treatment systems was approximately \$10,779,000, which included \$5,276,000 in capital costs and \$5,503,000 in O&M costs. The actual costs are not currently available.

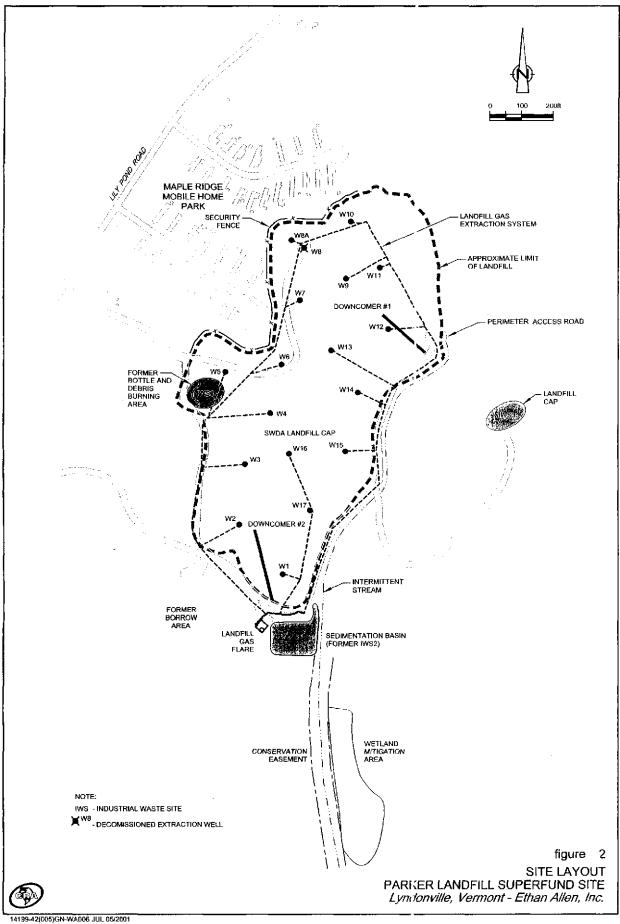
VI. FIVE YEAR REVIEW

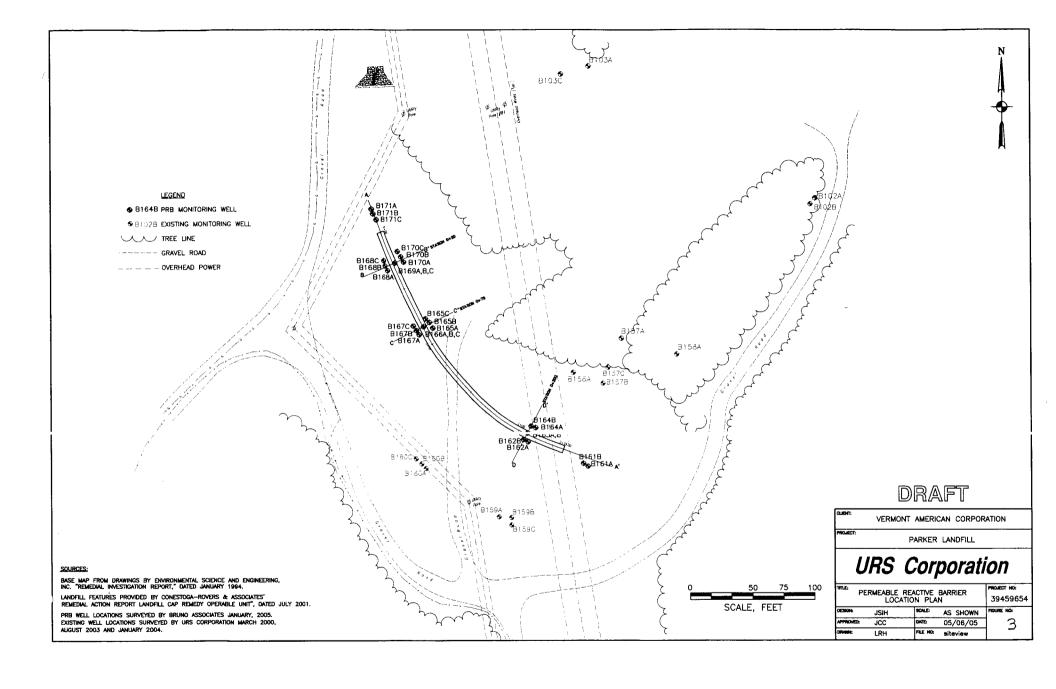
Hazardous substances will remain at the Site above levels that allow for unlimited use and unrestricted exposure after the completion of remedial action. Pursuant to CERCLA section 121(c) and as provided in OSV/ER Directive 9355.7-03B-P, "Structure and Components for Five-Year Reviews," dated June 2001, EPA must conduct statutory five-year reviews. The first five year review was completed in 2004 (five years after the initiation of cap construction activities in 1999). The second five year review is scheduled for September 2009. Subsequent five-year reviews will be conducted to ensure the remedy remains protective of public health and the environment. Finally, EPA will determine and document Site completion in accordance with OSWER Directive 9320.2-3A/3B "Procedures for Completion and Deletion of National Priorities List Sites" and OSWER Directive 9320.2-09 (August 1995).

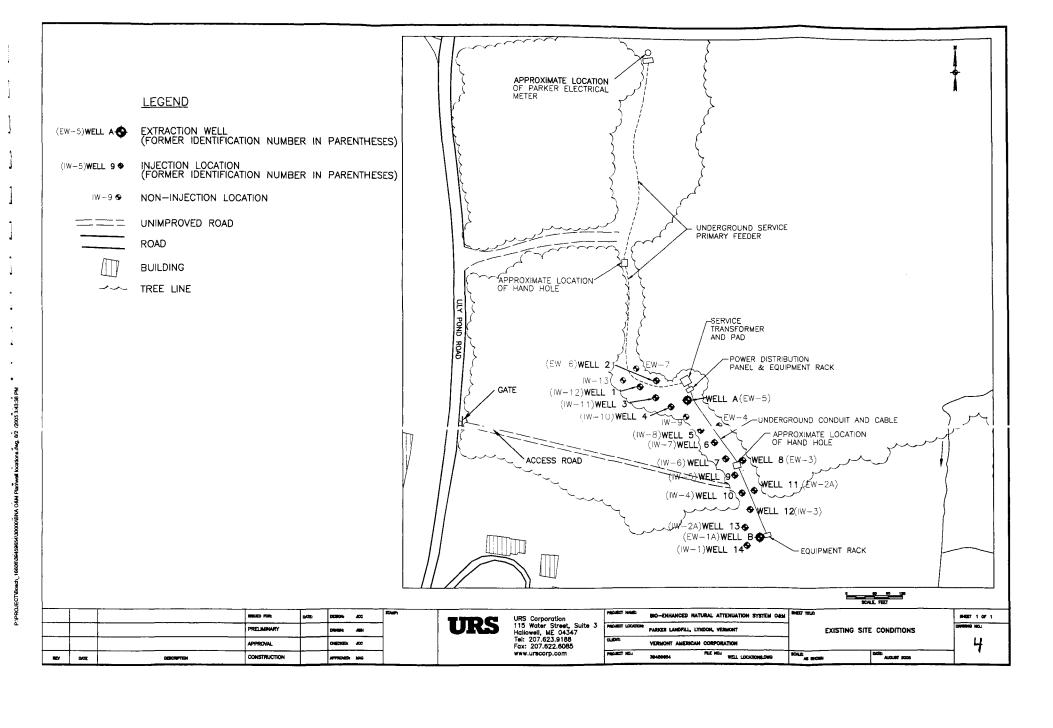
Approved by:	
Suxon Sicalien	09/30/05
Susan Studlien, Director Office of Site Remediation and Restoration	Date

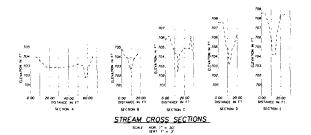
Figures

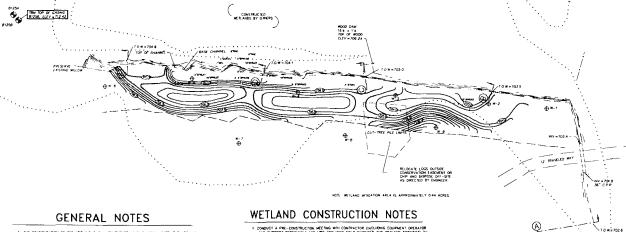












- THE CONFIGURATION OF THE WETLAND SHOWN ON THIS DRAWING IS APPROXIMATE. THE WETLAND SHALL BE CONSTRUCTED AS CLOSE AS PRACTICAL TO THE CONFIGURATION SHOWN AND/OR AS DIRECTED BY THE CHORMER
- THE ENGINEER WILL PROVIDE HANDS ON ASSISTANCE TO THE CONTRACTOR FOR WETLAND LAYOUT AND GRADING
- 4 EXISTING VEGETATED PORTIONS OF THE AREA TO BE EXCAVATED THAT ARE AT GRADE SHALL BE PRESERVED IN PRACTICAL
- 6 TEMPORARY EROSION AND SEDIMENT CONTROLS SHALL BE IN ACCORDANCE WITH GENERAL NOTES ON SHEET 2 OF THE PERMEABLE REACTIVE BARRIER DESIGN
- THE CONTRACTOR SHALL EXCAVATE THE WETLAND IN A MANNER THAT MINIMIZES DAMAGE TO THE SURROUNDING UNDISTURBED AREAS AND EXISTING WETLAND

- 11 NO EXCAVATION SMALL OCCUR DUTSIDE OF THE SO-FOOT CONSERVATION EASEMENT LIMIT
- 12 WORK SHALL BE PERFORMED IN GENERAL ACCORDANCE WITH THE GENERAL NOTES AND TECHNICAL SPECIFICATIONS FOR THE PERMEABLE REACTIVE BARRIER, AS APPROPRIATE

- 2 DELINEATE THE LIMITS OF EXCAVATION PRIOR TO BREAKING GROUND, USING STAKES AND WARNING TAPE OR OTHER APPROVED METHOD
- 3. WORK SHALL BEDIN AT THE DOWNSTREAM END AND COMMENCE UPSTREAM,

- THE ENGINEER WILL REVIEW THE SITE PERIODICALLY DURING PLANTING.

- 12 3H 1V SLOPES SHALL BE COVERED WITH DOUBLE NET EROSION CONTROL BLANKET SCISOBIN OR EQUIVALENT UNLESS OTHERWISE DIRECTED BY THE ENGINEER

PLANTING SPECIFICATIONS

- 3 PLANTING STOCK

SCIENTIFIC NAME	COMMON NAME	STATUS	NUMBER
A N. C. (MEANA SSP. RUGUSA (A. PUGUSA)	SPECKLED ALDER	FACY	60
CHRYLE ANDWER	SILKY BOGHOOD	FACU	100
46 FA TESTELOP	PUZSY VILLDY	FACH	79
VICE INJUM CONVERSES M THE CHEATTETH ATA	HIGHBUSH BLUEBERRY ASSORTED WINTERBERRY	FACH	30 50
I INTER A SE VAR LATIFICIA	MEANOMENEET	rara.	70

- THE URS WETLAND SCIENTIST SHALL REVEW ALL PLANTING STOCK JUST PRIOR TO PLANTING TO ASSURE QUALITY AND QUARTITES. COPIES OF ALL PACKING SUPES FOR PLANT MATERIALS AND SEED MIKES SHALL BE PROWINDED TO THE REVINEER PRIOR TO USE
- PLANT DORMANT WILLOW WATRES ALONG STREAM NUMBER AND LOCATION TO BE DETERMINED IN CONSULTATION WITH VIDEO AND USE'MS.



BORING LOGS

		7111110	-000
BORING LOCATION	DEPTH TO WATER	GROUND VATER	SOIL DESCRIPTION
W-1	17 INCHES	702 4	O'-6' DARK BROWN SILT TRACE SAND AND CLAY 6'-28' GRAY FINE SAND SILT TRACE CLAY
V-2	40 INCHES	700 5	D'-9" DARK BROWN SILT TRACE SAND AND CLAY 9"-45" GRAY FINE SAND AND SILT TRACE CLAY
V-3	S8 1MCH€2	703 3	0'-7' DARK BROWN SILT TRACE SAND AND CLAY 7'-36' GRAY FINE SAND AND SILT TRACE CLAY 36' WIDD
¥-4	36 THCHES	703 7	D'-6' DARK BRUNN SILT TRACE SAND AND CLAY 6'-50' GRAY FINE SANDY SILT TRACE CLAY
W-5	51 INCHES	704 3	0"-8" DARK BROWN SILT WITH SAND TRACE CLAY 8"-40" GRAY FINE SANDY SILT TRACE CLAY 40"-60" SAME AS ABOVE HIGHER SILT CONTENT
V-6	49 INCHES	704 7	D'-9' DARK BROWN SILT TRACE SAND AND CLAY, 9'-56' GRAY FINE SANDY SILT WITH CLAY
¥ 7	13 INCHES	705 B	D'-8" DARK BROWN SILTY SAND WITH CLAY 8'-33" GRAY SILT WITH CLAY TRACE FINE SAND
w·8	4) INCHES	703 3	D'-7' DARK BROWN SILT AND SAND WITH CLAY 7'-36' GRAY SILT WITH CLAY 36'-60' SAME AS ABOVE WITH HOITLING
u-9	DRY	(70) 8·	O'-6' BARK BROWN SILT FINE SAND 6'-20' LIGHT BROWN FINE SAND WITH SILT 20'-96' LIGHT BROWN SAND

LEGEND

EXISTING		PROPOSED
	CONTOUR	
706	INDEX CONTOUR	
	· EXISTING DELINEATED	
⊕ ₩-8	HAND BORING BY UR	RS
· ,	EXISTING MONITORING V	MELL
	- APPROX. STREAM CENTERLINE	
	 50' CONSERVATION EASEMENT (SETBACE 	
	FROM STREAM CENTERS	
T.O.W	TOP OF WATER	

REVIEW PLAN - NOT FOR CONSTRUCTION

1	08/18/0	REGULATOR REVIEW REVISIONS ADDED	ISSUED FOR:	DATE:	DESIGN. LL/DW	STAMP-		PROJECT NAME	WETLAND MITIGATION	DWG TITLE	Sheet 1 of 1 Drawing #:
	-		PRELIMINARY	AUG 2005	DRAWN. CAM		URS Corporation 477 Congress St., 9th Floor	}	DIRECT MARKET MA	SITE GRADING	Didwing #.
			APPROVAL		CHECKED: JCC		Tel: 207.879.7686 Fox 207.879.7685	1	PARKER LANDFILL, LYNDON, VERMONT VERMONT AMERICAN CORPORATION	AND PLANTING PLAN	5
REV	DATE	DESCRIPTION	CONSTRUCTION		APPROVED: JCC		www.urscorp.com	PROJECT NO	39459654	SCALE 1" = 30" DATE. AUGUST 2005	

APPENDIX A

Final Inspection Reports

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY Region 1

MEMORANDUM

DATE:

September 29, 2005

SUBJECT:

Parker Landfill Superfund Site, Lyndo wille, VT

Final site Inspection

FROM:

Leslie McVickar,

Remedial Project Manager

TO:

The File

On September 26, EPA conducted it's final inspection at the Parker Landfill Superfund Site. On September 22 the Vermont Department of Environmental Conservation (VTDEC) conducted their final inspection. Both EPA and the VTDEC cor cur that the Remedial Response has been constructed in accordance with all applicable Remedial Action Work Plans and Remedial Design Reports. Attached is a punch list of outstanding items to be accomplished to achieve final acceptance.

Leslie McVickar, EPA Remedial Project Manager

Date

Parker Landfill Superfund Site Ground Water Ren ediation Punch List Items September 26, 2005

No.	Area	Item	Date Listed	Date to be Addressed
1.	Sitewide	Remove trailers, portable sanitary facilities	9/26/05	12/31/05
2.	Sitewide	Final Inspection	9/26/05	Completed
3.	PRB	Remove full dumpster (solid waste)	9/26/05	12/31/05
4.	PRB	Repair erosion damage to road and stream crossing (rills, haybales, etc.)	9/26/05	11/30/05
5.	PRB	As-built survey, including setting pins per VTDEC requirements	9/26/05	12/31/05
6.	PRB	Remove empty Clean Harbors dumpstor	9/26/05	Completed
7.	PRB	Re-seed bare areas	9/26/05	Completed
8.	BNA	Test extraction pumps	9/26/05	Completed
9.	BNA	Assemble/leak test injection system	9/26/05	Completed
10.	BNA	Wet test injection system	9/26/05	Completed
11.	BNA	State electrical inspection	9/26/05	Completed
12.	BNA	Dispose water from frac tank	9/26/05	11/1/05
13.	BNA	Remove frac tanks	9/26/05	12/1/05
14.	BNA	Hydroseed three bare areas	9/26/05	Completed
15.	BNA	Repair erosion damage	9/26/05	Completed
16.	Wetland	Complete plantings	9/26/05	Completed
17.	Wetland	Re-evaluate inlet design	9/26/05	05/30/06



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 1 CONGRESS STREE , SUITE 1100 BOSTON, MASSACHUSETTS 02114-2023

JUL 11 2001

July 5, 2001

Paul Kaminski Project Coordinator Parker Landfill Superfund Site Ethan Allen Drive P.O. Box 1966 Danbury, CT 06813-1966

Re:

Parker Landfill Superfund Site, Actions pursuant to Consent Decree for Remedial Action,

Civil Action Number 2:97-CV-313

Dear Mr. Kaminski:

The EPA, VTDEC, and Performing Settlors site inspection of June 20, 2001 satisfied the consent decree requirement for a pre-certification inspection. The landfill and related system were in good condition. EPA, after reasonable opportunity for review and comment by the VTDEC, is providing a punch list of outstanding items to be accomplished to achieve final acceptance with this letter. The RA/Certification Report is due by July 20th, 2001.

With this letter EPA also formally acknowledges that the November 1999 Notice of Violation with respect to Vermont Water Quality Standards and excessive erosion is not longer in effect. The landfill and adjacent areas have been adequately stabilized. Final resolution of the Notice of Violation includes the acceptance of the created wetlands and the establishment of the conservation easement/buffer along the Brook. Please contact me at (617) 918-1372 if you have any questions.

Sincerely,

Edward M. Hathaway, RPM ME/VT/CT Superfund Section

CC.

Leslie McVickar, EPA RPM

John Schmeltzer, VT DEC

Brian O'Mara, TRC

Jim Campbell, EMI

Fred Taylor, CRA Rick Lewis, ITGTI

Marcel Guay, Dames and Moore

Santo Longo, Lebouef, Lamb, Green, and MacRae

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Punch List Items to Achieve Final Acceptance

- 1. Install insect screen for 6 inch diameter HDP E Vent Pipe for Landfill Gas Condensate Tank. (Reference Drawing C-314, Detail F)
- 2. Install bollards or suitable protection devices to protect above ground components of underground storage tank for Landfill Gas Condensate System.(Reference Drawing C-314, Detail F)
- 3. Install protective casing or enclosure for above grade portions of instrument boxes for the underground storage tank for Landfill Gas Condensate System.(Reference Drawing C-314, Detail F)
- 4. Locks shall be installed on gas probes that are not flush mounted. (Reference Drawing C-306)
- 5. Install insulation on exposed piping within the gas well enclosures. (Drawing C-312).
- 6. Place more riprap over the outlet for Culvert No. 3 or add top soil so that grass can grow under erosion control blanket over outlet.
- 7. Place more riprap at inlet structure for Culvert No. 3
- 8. Stabilize the banks of the stream adjacent to the construction access road to repair recent erosion and to minimize future erosion.
- 9. Repair the protective casings of groundwater wells B-111 and B-112 to prevent accumulation of water within the casing.
- 10. Establish complete vegetative cover over IW\$-3 and adjacent areas, including drainage areas.
- 11. Install 7 landfill gas monitoring wells to serve as compliance points for the shallow and deep landfill gas.
- 12. Install data logging devices within two of the landfill gas monitoring well cluster to provide long-term assessment of shallow and intermediate gas.
- 13. Install a alarm devices at two locations to notify Performing Settlors of methane within the shallow zone.



State of Vermont

Department of Fish and Wildlife
Department of Forests, Parks, and Recreation
Department of Environmental Conservation
State Geologist
RELAY SERVICES FOR THE HEARING IMPAIRED
1-800-253-0191 TDD>Voice
1-800-253-0195 Voice>TDD

September 30, 2005

Leslie McVickar Environmental Protection Agency New England, Region 1 1 Congress Street, Suite1100 Boston MA 02114-2023

Re:

Superfund Preliminary Close out Report

Parker Landfill, Lyndon, Vermont (Site #77-0013)

Dear Leslie:

The Vermont Department of Environmental (VT DEC) has reviewed the Preliminary Close Out Report (PCOR) prepared by the United States Environmental Protection Agency (EPA) and participated in inspections to evaluate the Remedial Action at the Parker Landfill Superfund Site in Lyndon, Vermont. The VT DEC concurs with the Environmental Protection Agency (EPA) that the construction activities at the Parker Landfill Superfund site are substantially completed. The VT DEC also concurs with EPA's punch list of outstanding items to be accomplished before final acceptance is granted. Punch list items, which are attached to the Superfund site Preliminary Close Our Report (PCOR) dated September 2005, include stabilizing the former unnamed stream cross ng that was used as access to the permeable reactive barrier (PRB) area and ensuring that the newly created wetland area becomes established. As stated in the PCOR, I do not anticipate additional remedial construction activities action at this site unless the existing remedial actions are not meeting the performance objectives of the Record of Decisio 1 (ROD).

AGENCY OF NATURAL RESOURCES
Department of Environmental Conservation
WASTE MANAGEMENT DIVISION

103 South Main Street

FAX 802-241-3296

TEL 802-241-3888

Waterbury, VT 05671-0404

West Building

Sincerely.

John Schmeltzer, Project Manager

Sites Management Section

cc:

Ed Hathaway, EPA

Jason Clere, URS Corporation, Portland, Maine Dale Weiss, TRC Corporation, Lowell, MA Tom Cleland, Fairbank Scales, St Johnsbury